

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MARLON MANSWELL,

Plaintiff,

-against-

CITY OF NEW YORK; Police Officer "JOHN" BRUNSON; and JOHN and JANE DOE 1 through 10, individually and in their official capacities, (the names John and Jane Doe being fictitious, as the true names are presently unknown),

Defendants.

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**DECLARATION OF
GABRIEL P. HARVIS**

10 CV 5878 (FB) (VVP)

GABRIEL P. HARVIS, an attorney duly admitted to practice law in the Courts of the State of New York, hereby affirms, under penalty of perjury, the following:

1. I am a partner with the law firm of Harvis & Saleem LLP, attorneys for plaintiff Marlon Manswell in the above-captioned action. I submit this declaration in support of plaintiff's opposition to defendant City of New York's Motion for Reconsideration Pursuant to Local Rule 6.3 and plaintiff's Cross-Motion for Expenses Pursuant to FED. R. CIV. P. 37(a)(5) and 28 U.S.C. § 1927.

2. The annexed exhibits are relevant to plaintiff's opposition and cross-motion. Each exhibit is a true and accurate copy of what it purports to be, as follows:

3. Annexed hereto as Exhibit 1 is a copy of the Authorization for Release of Health Information Pursuant to HIPAA.

4. Annexed hereto as Exhibit 2 is a copy of the NYCHHC HIPAA Authorization to Disclose Health Information.

DATED: March 3, 2011
New York, New York

HARVIS & SALEEM LLP



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